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9 *for the Certificateholders CWMBS, Inc., CHL*
Mortgage Pass-Through Trust 2005-HYB4,
Mortgage Pass-Through Certificates, Series
2005-HYB4

10 **UNITED STATES DISTRICT COURT**
11 **DISTRICT OF NEVADA**

12 THE BANK OF NEW YORK MELLON FKA
13 THE BANK OF NEW YORK AS TRUSTEE
14 FOR THE CERTIFICATEHOLDERS CWMBS,
15 INC., CHL MORTGAGE PASS-THROUGH
16 TRUST 2005-HYB4, MORTGAGE PASS-
THROUGH CERTIFICATES, SERIES 2005-
HYB4;

17 Plaintiff,

18 vs.

19 SUNRISE RIDGE MASTER HOMEOWNERS
20 ASSOCIATION; SFR INVESTMENTS POOL 1,
21 LLC; and NEVADA ASSOCIATION
SERVICES, INC.,

22 Defendants.

Case No. 2:17-cv-00214-JAD-GWF

**STIPULATION AND ORDER TO
EXTEND DISCOVERY DEADLINES**

[FIRST REQUEST]

SFR INVESTMENTS POOL 1, LLC,

Counter/Cross Claimant,

vs.

THE BANK OF NEW YORK MELLON FKA
THE BANK OF NEW YORK AS TRUSTEE
FOR THE CERTIFICATEHOLDERS CWMBS,
INC., CHL MORTGAGE PASS-THROUGH
TRUST 2005-HYB4, MORTGAGE PASS-
THROUGH CERTIFICATES, SERIES 2005-
HYB4; PATTY TAN, an individual,

Counter/Cross Defendants.

STIPULATION AND ORDER TO EXTEND DISCOVERY DEADLINES

Plaintiff/Counter-Defendant The Bank of New York Mellon fka The Bank of New York as Trustee for the Certificateholders CWMBS, Inc., CHL Mortgage Pass-Through Trust 2005-HYB4, Mortgage Pass-Through Certificates, Series 2005-HYB4 (**BoNYM**), Defendants/Counterclaimant/Cross-Claimant SFR Investments Pool 1, LLC (**SFR**) and Sunrise Ridge Master Homeowners Association (**HOA**), by and through their respective counsel of record, and hereby jointly submit this Stipulation and Order to Extend Discovery Deadlines (First Request) pursuant to LR 6-1 and LR 26-4. This is the first request to extend the discovery deadlines set by the Scheduling Order entered by the Court on April 18, 2017. ECF No. 23.

A. STATEMENT SPECIFYING THE DISCOVERY COMPLETED

1. Rule 26 Disclosures

BoNYM served its initial disclosures on April 10, 2017. SFR served its initial disclosures on April 24, 2017. BoNYM served its first supplement to initial disclosures on May 11, 2017. BoNYM served its second supplement to initial disclosures July 28, 2017. SFR served its second supplement to initial disclosures on June 15, 2017. BoNYM served its initial expert disclosures on November 9, 2017. SFR served its initial expert disclosures on November 13, 2017.

2. Written Discovery

BoNYM served SFR with First set of Requests for Admissions, First set of Requests for Production and First set of Interrogatories on April 20, 2017. BoNYM served HOA with First set of Requests for Admissions, First set of Requests for Production and First set of Interrogatories on April 20, 2017. SFR served Objections and Responses to First set of Requests for Admissions, First set of Requests for Production and First set of Interrogatories on May 30, 2017.

3. Depositions

BoNYM deposed witness Susan Moses 30(b)(6) representative for Nevada Association Services, Inc. SFR served a notice of deposition of BoNYM to take place on December 11, 2017. BoNYM has served a notice of deposition of the HOA.

B. STATEMENT OF DISCOVERY REMAINING TO BE COMPLETED

An extension of the discovery period is sought to allow for SFR to reschedule the deposition of the BoNYM after SFR serves and receives responses to written discovery. The parties expect that the written discovery responses may limit or eliminate some of the deposition topics. BoNYM has also scheduled the deposition for the HOA, which needs to be completed. The parties reserve the right to conduct additional discovery.

C. REASONS WHY AN EXTENSION IS REQUIRED

The parties stipulate to extend discovery to allow the SFR to serve written discovery and time to take BoNYM's Rule 30(b)(6) witness deposition, as well for BoNYM to take the HOA's deposition.

D. PROPOSED SCHEDULE FOR ALL REMAINING DISCOVERY

	<u>Current Deadline</u>	<u>Proposed Deadline</u>
Discovery Cut-Off:	January 9, 2018	March 12, 2018
Dispositive Motions Deadline:	February 8, 2018	April 9, 2018

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Based on the foregoing, the parties respectfully request the court extend the remaining discovery deadline by sixty (60) days. The parties make this request in good faith and believe good cause exists for extending these deadlines.

Dated: December 4, 2017

<p>AKERMAN LLP</p> <p><u>/s/ Tenesa S. Scaturro</u> ARIEL E. STERN, ESQ. Nevada Bar No. 8276 TENESA S. SCATURRO, ESQ. Nevada Bar No. 12488 1160 Town Center Drive, Suite 330 Las Vegas, Nevada 89144</p> <p><i>Attorneys for The Bank of New York Mellon fka The Bank of New York as Trustee for the Certificateholders CWMBs, Inc., CHL Mortgage Pass-Through Trust 2005-HYB4, Mortgage Pass-Through Certificates, Series 2005-HYB4</i></p>	<p>HALL, JAFFE & CLAYTON, LLP</p> <p><u>/s/Ashlie L. Surur</u> ASHLIE L. SURUR, ESQ. Nevada Bar No. 11290 7425 Peak Drive Las Vegas, Nevada 89128</p> <p><i>Attorney for Sunrise Ridge Master Homeowners Association</i></p>
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IT IS SO ORDERED.


UNITED STATES MAGISTRATE JUDGE

DATED: December 5, 2017